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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2405

FEB 25 1991

Ref: 8HWM-FF

Mr. David Simonson  
Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

RE: Proposed Schedule for  
Woman Creek IM/IRA

Dear Mr. Simonson:

We have reviewed the proposed schedule for completion of a Woman Creek IM/IRA Decision Document contained in your letter of 15 February 1991. It appears the schedule extends well beyond the time that should be required, and we would like to offer an alternative completion date.

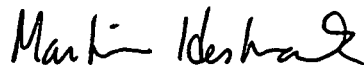
Among the problems we have identified in your letter is that the proposed schedule for the Woman Creek IM/IRA shows serial insertion of NEPA reviews, resulting in 40 working days delay. It must be clearly understood that DOE perceived NEPA procedural requirements do not relieve DOE of the responsibility to comply with all deadlines as set forth in the IAG. In addition, all review cycles are inserted serially. Regulatory review of the draft, for instance, normally runs concurrent with the RFP review period. Finally, time frames for document submittal and review which were set up to accommodate an RI/FS for an entire OU do not apply to writing an IM/IRA plan. This is particularly true for the Woman Creek IM/IRA Decision Document, since much of it has already been prepared and reviewed by EPA and the State.

Using these and other schedule adjustments, it is our conclusion that the Draft OU 2 IM/IRA Decision Document for Woman Creek should be scheduled for submission on 1 October 1991; this will lead to release of the Final Decision Document and Responsiveness Summary to the public not later than 1 May 1992.

ADMIN RECORD

If you have questions or would like to discuss the schedule logic on which these dates are based, please contact Bill Fraser (294-1132) or Joe Schieffelin (332-4421).

Sincerely,



Martin Hestmark, EPA  
Rocky Flats Team Leader



Gary Baughman, CDH  
Unit Leader  
Hazardous Waste Facilities

cc: Barbara Barry (CDH)  
Scott Grace (DOE)  
Tom Greengard (EG&G)  
Frazer Lockhart (DOE)